

RICK A. YARNALL
CHAPTER 13 BANKRUPTCY TRUSTEE
Daniel Riggs, Esq.
Nevada Bar No. 12270
Amanda Hunt, Esq.
Nevada Bar No. 12644
701 Bridger Ave, Suite 820
Las Vegas, NV 89101
(702) 853-4500
RAY13mail@LasVegas13.com

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

IN RE:

MARCUS DONELLE THOMPSON

Debtor(s)

BK-S-19-14908-MKN
Chapter 13

Hearing Date: September 16, 2021
Hearing Time: 2:00 PM

MOTION TO DISMISS

COMES NOW Chapter 13 Bankruptcy Trustee, RICK A. YARNALL, and hereby moves this Honorable Court for an Order dismissing the above-captioned case pursuant to 11 U.S.C. § 1307. On 07/31/2019 the instant bankruptcy case was commenced and the plan was confirmed on 09/23/2020. The Trustee requests that this case be dismissed pursuant to 11 U.S.C. § 1307 for the following reasons.

Dismissal is appropriate when a debtor defaults under a confirmed plan. 11 U.S.C § 1307(c)(6).

In this case, the confirmed plan requires that the Debtor(s) make monthly payments in the amount of \$224.00. A review of this case shows that the Debtor(s) last successful payment was made on 6/14/2021. To date, the Debtor(s) are \$448.00 delinquent in plan payments. Delinquency in plan payments constitutes a material default under the confirmed plan. Therefore, the instant case should be DISMISSED.

1 WHEREFORE, the Trustee respectfully requests that this Honorable Court issue an Order
2 Dismissing the instant case for delinquent plan payments.
3

4 DATED: August 10, 2021

/s/ Daniel Riggs

Daniel Riggs, Esq.
Nevada Bar No.: 12270
701 Bridger Ave, Suite 820
Las Vegas, NV 89101
Attorney for RICK A. YARNALL

CERTIFICATE OF MAILING

I hereby certify that I am an employee of RICK A. YARNALL, Chapter 13 Bankruptcy Trustee;
that I am over the age of 18 years; and that on this date I provided a copy of the Trustee's Motion to
Dismiss with Notice of Hearing to each of the following by:

☒ a. ECF System:

Rick A. Yarnall ecfmail@LasVegas13.com; ecfimport@lasvegas13.com
GEORGE HAINES igotnotices@hainesandkrieger.com

☒ b. United States mail, postage fully prepaid:

MARCUS DONELLE THOMPSON
3392 PAVLO ST.
LAS VEGAS, NV 89121

DATED: August 10, 2021

/s/ Leah Engel
Employee of
RICK A. YARNALL, CHAPTER 13 TRUSTEE